REMARKS

Applicants would like to thank the Examiner for the courtesies extended during the telephonic interview of June 17, 2003. During the interview Applicants expressed their understanding that the prior art cited by the Examiner failed to teach or suggest the invention claimed by Applicants. The Applicant further directed the Examiner to passages in the specification that are believed to resolve the Examiner's rejections under 35 U.S.C. § 112, ¶ 2. Applicants respectfully submit that the rejections should be withdrawn in view of these responses, which are set forth in further detail below.

Rejections under 35 U.S.C. §112

The Examiner rejected claims 1-18 under 35 U.S.C. §112, ¶ 2, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the applicant regards as the invention.

The Examiner rejected claims 1, 7, 11, 17, and 18 and claims 2-6, 8-10, and 12-16, which are dependent from claims 1, 7, and 11, respectively, on the basis that the term "current format indicator" is indefinite. Applicants submit that the phrase "current format indicator" is clear on its face. It is an indicator, such as a version number, associated with the current format of the data or object. The specification at page 7, lines 13-31 provides several examples and implementations involving current format indicators, in particular version number tags. Applicants respectfully submit that those skilled in the art would fully and readily understand the meaning of "current format indicator" in this context.

The Examiner rejected the claims on the basis that the term "schema" is indefinite. However, the specification clearly states that the "schema describes the layout of the data for some format of some implementation." (Page 8, line 5) On the following pages, the specification provides numerous examples of such schemas. The Applicants respectfully submit that those skilled in the art would fully understand the meaning of "schema" as that term is used in the claims.

The Examiner rejected the claims asserting "Lines 9-13 [of claim 1] are indefinite and inconsistent" and "the representations and schemas are inconsistent together, and the references

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are inconsistent." (4-02-03 Office Action, page 2) Applicants respectfully disagree and direct the Examiner to the embodiment shown in Fig. 3 and described in accompanying text on page 6, lines 15-25. Fig 3 shows the persistent source data (81) and target data (83) and the source and target schemas contained in plug-in 82. This figure shows the conversion manager contained in application program 80 reading the source and target schemas contained in plug-in 82, opening an input stream to the source persistent data 81 and opening an output stream via which the converted or target data 83 is written after format conversion. (See page 6, lines 21-25) The term "schema" is not indefinite as discussed above, and the first representation of a persistent object and the second representation generated by a conversion engine are described in the embodiment shown in Fig. 3 as the "persistent source data 81" and the "converted or target data 83," respectively. (See page 6, lines 22-24) Especially when read in view of the clear teachings set forth in the specification, the terms "schema" and "representation" are both definite and consistent as used in the pending claims.

The Examiner also rejected the claims on the basis that "Line 14 [of claim 1], recreating the persistent object with 'the second representation,' is indefinite." (Office Action of 4-02-03, page 2) However, as discussed above, the "second representation" is clearly described in the embodiment of Fig. 3 as the "converted or target data 83." (See page 6, lines 22-24) Applicants respectfully submit that those skilled in the art would readily understand the meaning of the term "second representation" in this context.

The Examiner rejected claim 10 asserting the term "hybrid" is indefinite. However, hybrid systems are described in detail in the specification. For example, the schema conversion service can be combined with one or more traditional hard-coded conversion services to yield a hybrid system. (See page 12, lines 15-16 and lines 23-25) The Applicants respectfully submit that those skilled in the art would fully and readily understand the meaning of the term "hybrid" as it is used in the specification and the claims.

In light of the foregoing remarks, Applicants respectfully request withdrawal of the rejections under 35 U.S.C. § 112, ¶ 2.

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Rejections under 35 U.S.C. §103(a)

The Examiner rejected claims 1-4, 7-9, 11-14, 17 and 18 under 35 U.S.C. § 103(a) as being unpatentable over alleged Applicant Admitted Prior Art (AAPA) in view of Guck (U.S. Patent No. 5,911,776) While the Applicants do not concede the alleged AAPA is prior art, the Applicants nevertheless believe that the claims easily distinguish over the alleged AAPA. Applicants expressly reserve the right to contest any assertion or finding that the alleged AAPA is in fact prior art.

Guck teaches file conversion using a source file, multiple shadow files, and multiple converters. (See Guck, Fig. 2B and col. 8, lines 9-29) "[E]ach shadow file in the database has *its own personal converter* . . . which is available for transforming the original document . . . from its original format into any one of a number of other desired formats," and "each shadow file has a dedicated converter C." (Guck, col. 17, lines 20-24, emphasis added; Guck, col. 8, lines 23-24, respectively) Such dedicated conversion engines are hard-coded to perform a fixed, predetermined conversion. (Id.) In contrast, claims 1, 7, 11, 17, and 18 recite a conversion engine or service that accepts as inputs both source and target schemas or format information. In various embodiments, this protocol may provide a "universal" conversion engine that is configured to convert from various source formats to various target formats. In Guck, by contrast, there is no teaching or suggestion that the conversion engine may convert to multiple target formats or accept as inputs multiple schemas or format indicators. (See Guck, col. 18, lines 26-30)

Guck and the alleged AAPA, taken alone or in combination, fail to teach or suggest the features recited in claims 1, 7, 11, 17 and 18. Accordingly, the Applicants respectfully submit that Guck, even in combination with the alleged AAPA, cannot render obvious the subject matter of claims 1, 7, 11, and 18. Applicants believe claims 2-4, 8 and 9, 12-14, which depend from claims 1, 7, and 11, respectively, are also allowable because they depend from an allowable base claim.

New Claims 19 and 20

New claims 19 and 20 have been added. The claims present no new issue or subject matter.

Conclusion

     Applicants respectfully submit that foregoing responses resolve the Examiner's rejections under 35 U.S.C. § 112, ¶ 2. Applicants also request that the Examiner withdraw rejections under 35 U.S.C. § 103(a) because <u>Guck</u>, taken alone or in combination with the alleged AAPA, fails to teach or suggest the limitations recited in the claims. Accordingly, the Applicants request claims 1-18 and newly added claims 19 and 20 be allowed.